

Vanessa R. Waldref  
United States Attorney  
Eastern District of Washington  
Caitlin A. Baunsgard  
Patrick J. Cashman  
Assistant United States Attorneys  
Post Office Box 1494  
Spokane, WA 99210-1494  
Telephone: (509) 353-2767

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

No. 4:21-CR-06022-SAB-1  
4:21-CR-06022-SAB-2  
4:21-CR-06022-SAB-4

**Plaintiff.**

VS

## BILL OF PARTICULARS FOR FORFEITURE OF PROPERTY

CARLOS REYES-SANTANA,  
EDUARDO REYES-SANTANA,  
MOLLY MARGRET BROWN.

#### Defendants.

The United States of America, by and through Vanessa R. Waldref, United States Attorney for the Eastern District of Washington, and Caitlin A. Baunsgard, Assistant United States Attorney, hereby files this Bill of Particulars for Forfeiture of Property.

The Indictment filed May 26, 2021, contains a Notice of Criminal Forfeiture providing notice that the United States is seeking forfeiture of property pursuant to 21 U.S.C. § 853. ECF No. 47 at 2-3.

1       The United States hereby gives notice that the United States is seeking  
2 forfeiture of the following assets from the Defendants as listed below:  
3

4       Defendant Carlos Reyes-Santana

- 5           - \$420,150.00 U.S. Currency;  
6  
7           - \$70,150.00 U.S. Currency (storage unit)  
8  
9           - Beretta USA Corp 92X 9mm pistol, serial number: 92X0003458,  
10          magazine and ammunition;

11       Defendant Eduardo Reyes-Santana

- 12           - 2017 Mercedes CLA, Washington License BXC3513, VIN:  
13          WDDSJ4GBXHN431714

14       Defendant Molly Margret Brown

- 15  
16           - \$5,071.00 U.S. Currency

17       DATED: October 27, 2021

18  
19           Vanessa R. Waldref  
20          United States Attorney

21  
22           *s/ Caitlin A. Baunsgard* \_\_\_\_\_  
23          Caitlin A. Baunsgard  
24          Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that on October 27, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

Richard A. Smith  
Attorney for Defendant Carlos Reyes-Santana  
[rasmith@house314.com](mailto:rasmith@house314.com)

Kenneth D. Therrien  
Attorney for Defendant Eduardo Reyes-Santana  
[kentherrien@msn.com](mailto:kentherrien@msn.com)

Walter L. Ayers  
Attorney for Defendant Molly Margaret Brown  
[walter@ayerslawfirm.net](mailto:walter@ayerslawfirm.net)

Justin Lonergan  
Attorney for Defendant Molly Margaret Brown  
[jlonergan@bsslawfirm.co](mailto:jlonergan@bsslawfirm.co)

*s/ Caitlin A. Baunsgard*

---

Caitlin A. Baunsgard  
Assistant United States Attorney